UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

Apple Bus Company,
Employer,
and

Case No. 19-RD-216636

General Teamsters Local 959,
Union,
and

Elizabeth Chase,
Petitioner.

PETITIONER'S FIFTH REQUEST FOR REVIEW

Petitioner Elizabeth Chase ("Petitioner" or "Chase") requests review of the Regional Director's August 20, 2019 election block, Petitioner's *fifth* request for review since March 2018. NLRB Rules & Regs. §§ 102.67 and 102.71; Ex. A, Reg'l Director's Letter Holding in Abeyance, *Apple Bus Co.*, Case No. 19-RD-216636 (August 20, 2019). General Teamsters Local 959's ("Teamsters") continues to file unfair labor practice charges ("ULP") and the Region continues automatically to hold Petitioner's decertification election in abeyance right on the brink of an election being a possibility for this bargaining unit, which has waited since July 2017 to exercise its NLRA Sections 7 and 9 rights. 29 U.S.C. §§ 157 and 159.

Despite the Act's purpose of securing employee free choice, the current "blocking charge" rules continue to have significant negative consequences on employees' rights to express their views about representation. Chase urges the Board to reevaluate its continued allowance of "blocking charges" to prevent her decertification election as cases that halt employee

decertification elections raise "compelling reasons for reconsideration of [a] . . . Board rule or policy." NLRB Rules & Regs. §§ 102.71(b)(1), (2).[1]

FACTS

Petitioner adopts and incorporates the facts stated in her August 1, 2019 Fourth Request for Review, *see* Ex. E, at 2–9, and provides the updated information below that has taken place since.

A. One out of three settlements finally complete.

On March 28, 2019, Teamsters filed a blocking charge claiming Apple Bus interfered with a Teamsters representative's access to both the property and employees. Ex. E, at Ex. T, Charge Against Employer, Case No. 19-CA-238757. Teamsters and Apple Bus entered into a Board settlement ("Second Settlement") on, or about, May 14, 2019 resolving it, Ex. E, at Ex. U, Settlement Agreement, and the case closed in compliance on August 8, 2019, Ex. A, at 2 n.1. Under the Board's August 20, 2019 letter, that charge is no longer blocking the decertification election. Ex. A, at 2 n.1.

B. Teamsters withdraws one of its four new blocking charges.

Teamsters filed Case 19-CA-242879 on June 6, 2019 alleging Apple Bus improperly directed employees to talk to the employer, in addition to a Teamsters representative, about

[1] S*ee Heavy Materials, LLC-St. Croix Div.*, 12-RM-231582 (Order of May 30, 2019), https://apps.nlrb.gov/link/document.aspx/09031d4582c2b074 (Members Kaplan and Emanuel noting they "would consider revisiting the Board's blocking charge policy in a future appropriate proceeding"); *UFCW Local 951*, 07-RD-228723 (Order of April 25, 2019), http://apps.nlrb.gov/link/document.aspx/09031d4582bbf45f (Chairmen Ring and Member Emanuel noting the same); *Klockner Metals Corp.*, 15-RD-217981 (Order of May 17, 2018), http://apps.nlrb.gov/link/document.aspx/09031d45827eafd2 (Member Kaplan noting the same and also stating that "he believes an employee's petition for an election should generally not be dismissed or held in abeyance based on contested and unproven allegations of unfair labor practices"); *see, e.g.*, *Pinnacle Foods Grp., LLC*, No. 14-RD-226626, 2019 WL 656304, at *1 (Order of Feb. 4, 2019) (Chairmen Ring and Member Kaplan noting the suspect timing of ULP blocking charges suggests a purpose to delay a decertification election, and supports revisiting "the blocking charge policy in a future rulemaking proceeding"); *Metro Ambulance Servs.*, 10-RC-208221 (Order of July 17, 2018) (Chairman Ring and Member Emanuel stating there are "significant issues with the Board's Election Rule and the law pertaining to blocking charges that potentially frustrate the rights of employees, and they believe the policy should be reconsidered").

"bargaining proposals" through a May 21, 2019 flyer on a bulletin board. Ex. E, at Ex. W, Charge Against Employer, Case No. 19-CA-242879 (July 31, 2019). The Region approved Teamsters withdrawal of that charge on July 31, 2019, but did so only after the Region had granted Teamsters's request to block based on that charge. *See* Ex A, at 2 n.1; Docket Activity, https://www.nlrb.gov/case/19-CA-242879 (approving withdrawal on July 31, 2019)

C. Teamsters files yet another blocking charge.

On August 1, 2019, Teamsters filed a new blocking charge against Apple Bus almost five months after some of the alleged conduct occurred. Ex. B, Charge Against Employer, Case No. 19-CA-246017. In that charge, Teamsters publicly disparaged several of the very employees it is supposed to represent, questioning their work skills and, in effect, "throwing them under the bus." Ex. B, at 2. In this newest ULP charge, Teamsters claims Apple Bus has discriminated against pro-union employees by giving favorable treatment to three non-union members unlike the unfavorable treatment it gave to three union members in 2018 and one in 2019. Ex. B. Specifically, Teamsters claims Apple Bus:

1) fired Toni Knight ("Knight") in 2018 for leaving her school bus unattended while it was still running and with children still sitting on it but did not fire or discipline Linda Reichert ("Reichert") in February 2019 when she allegedly exited her school bus without "securing" it while children were on board and only reprimanded Elizabeth Chase (petitioner) for allegedly committing the same misconduct;
2) wrote up Rhonda Johnson ("Johnson") and required "retraining" for her to continue her employment with Apple Bus for an accident with a tree but did not do anything to Greg Fisher in February 2019 when he backed into another bus that was parked, or to Reichert who allegedly sideswiped another bus that was also parked; and

3) issued a written warning to Mario Concepcion in February 2019 for attendance issues, when no attendance policy exists, after it had initially suspended him in 2018 for hitting a guard rail but ultimately reduced his hours in half.

Ex. B, at 2.

Teamsters has, yet again, misstated the facts about Chase's, Reichert's, and Fisher's respective situations. Not only that, Teamsters has raised the very same allegation about alleged disparate discipline of Chase versus Knight that it did in a prior ULP charge it then withdrew four months later. Ex. E, at Ex. M, Charge Against Employer, Case No. 19-CA-222039 (June 12, 2018); Docket Activity, https://www.nlrb.gov/case/19-CA-222039 (approving withdrawal on Oct. 1, 2018). Rather than hold a hearing, determining the blocking charges' legitimacy, or ordering Teamsters to prove a "causal nexus" between the alleged conduct and the decertification petition, the Regional Director issued his seventh abeyance order based on these newest allegations. Ex. A. In addition, the Regional Director took the unprecedented step of continuing to "monitor compliance for a reasonable period [sic] time after the expiration of the notice posting period" of the two original charges even though the first two outstanding charges have been resolved through the First Settlement.[2] Ex. A, at 2–3.

Chase appeals this newest blocking charge abeyance decision that conflicts with her and the bargaining unit's Sections 7 and 9 rights. Teamsters's continued strategic blocking and the

[2] Under the NLRB's Casehandling Manual, a Region should process a petition once a settlement is reached for an alleged but unproven unfair labor practice, the respondent does not admit liability as part of that settlement, and the petition is not withdrawn. NLRB Casehandling Manual (Part Two) Representation Proceeding Secs. 11733.2(a)(1); 11733.2(a)(2); 11733.2(a)(3). Because all three things occurred here, it is unclear why the Region is still claiming it is proper for it to continue to hold the petition in abeyance. *See Cablevision Sys. Corp*., 367 NLRB No. 59, 2018 WL 6722907, *3 (2018) (affirming a Region must process a decertification election "'at the petitioner's request following the parties' settlement and resolution of the unfair labor practice charge'" (quoting *Truserv Corp.*, 349 NLRB 227, 227 (2007))).

Region's automatic abeyance based on Teamsters's unproven (and unprovable) allegations and its continued monitoring of resolved cases destroy Chase's and the bargaining unit's rights.

ARGUMENT

Petitioner adopts and incorporates the Sections I.A–C, and II.A arguments stated in her Fourth Request for Review, *see* Ex. E, at 11–16, 19, and provides the additional arguments below.

Following current practice, the Regional Director once again automatically blocked Petitioner's decertification election as soon as Teamsters filed its recent charge. Ex. A. As Chase has argued multiple times now, the Board should cease applying a double-standard to certification and decertification elections, grant Chase's request for review, reverse the Regional Director's decision, order Petitioner's election processed, and follow former Chairman Miscimarra's urging to implement a wholesale revision of the "blocking charge" rules. *Cablevision Sys. Corp.*, Case 29-RD-138839, *1 n.1 (June 30, 2016) (Order Denying Review), *dismissal rev'd, rem'd for pet. processing*, 367 NLRB No. 59 (2018).[3]

In the alternative, the Board should require the Region, before it automatically applies the "blocking charge" policy, either 1) explain specifically what causal connection(s) exists to permit it to block Petitioner's election, *see* NLRB Casehandling Manual (Part Two) Representation Proceeding Sec. 11730.4 [hereinafter Casehandling Manual]; 2) explain why it believes the employees cannot exercise their free choice in an election despite the new ULP charge, removing Exception 2's application, Casehandling Manual Sec. 11731.2; or 3) conduct a *Saint-Gobain*

[3] *See also Baltimore Sun Co. v. NLRB*, 257 F.3d 419, 426 (4th Cir. 2001) (noting Section 7 "guards with equal jealousy employees' selection of the union of their choice and their decision not to be represented at all"); *Valley Hosp. Med. Ctr., Inc. & SEIU Local 1107*, 28-RD-192131, 2017 WL 2963204 (Order Denying Review, July 6, 2017); *see also Pinnacle Foods Grp., LLC*, No. 14-RD-226626, 2019 WL 656304, at *1 (Order of Feb. 4, 2019) (Chairmen Ring and Member Kaplan, concurring)

"causation" hearing as a precondition to blocking Petitioner's decertification election, s*ee Saint-Gobain Abrasives, Inc.*, 342 NLRB 434 (2004).

I. The Board should overrule or revamp its "blocking charge" policy.

As the attached sworn declarations show, Exs. C–D; Ex. E, at Ex. N, Apple Bus has not treated union and non-union members differently in discipline proceedings nor has it interfered with employees' free choice despite Teamsters's multiple claims to the contrary. Rather, Teamsters's newest charge is baseless and filed to delay and postpone the decertification election rather than to advocate on behalf of wronged employees. Indeed, Teamsters has alleged misconduct on the part of the very employees it is bound to represent and publicly claimed that those employees were not appropriately reprimanded or punished for that alleged misconduct. Not only are the bald assertions of misconduct incorrect, such allegations make the Region's recent application of the "blocking charge" policy even worse.

Even if Apple Bus committed the alleged violations, those violations did not affect the decertification petition filed fifteen months before the latest blocking charge was even filed, nor could they cause employees to further disaffect from Teamsters. *See, e.g., Tenneco Auto., Inc. v. NLRB*, 716 F.3d 640, 649–50 (D.C. Cir. 2013) (noting not all employer ULPs taint employees' decertification petition). The employees' statutory right to petition for a decertification election should not be disregarded because Teamsters baldly asserts that Apple Bus acted unlawfully.

A.–C. [Incorporated from Fourth Request for Review. *See* Ex. E, at 11–16.]

D. Chase's case continues to show the "blocking charge" policy's impingement on employees' rights.

Despite majority support for decertification since March 2018, the Region continues to postpone Petitioner's decertification election based on the notion that some connection *might* exist between that petition and the allegedly unlawful "new" employer conduct. Conduct that is not even

new but, according to Teamsters, began all the way back in March 2018. By continuing to postpone the election based solely on Teamsters' ULP filings, the Regional Director's seventh swift denial of Petitioner's and employees' Section 9(c)(1)(A)(ii) right to a decertification election continues to highlight the "blocking charge" policy's farcicality.

1. The causal nexus test.

To block an election, *Master Slack Corporation* demands a ULP be "of a character as to either affect Teamsters's status, cause employee disaffection, or improperly affect the bargaining relationship itself." 271 NLRB 78, 84 (1984). Stated more succinctly, "the unfair labor practices must have caused the employee disaffection here or at least had a 'meaningful impact' in bringing about that disaffection." *Id.* To determine whether a causal connection exists, one must analyze several factors including: "[1] the nature of the illegal acts, including the possibility of their detrimental or lasting effect on employees; [2] any possible tendency to cause employee disaffection from the union; and [3] the effect of the unlawful conduct on employee morale, organizational activities, and membership in the union." *Id.* (citing *Olson Bodies, Inc.*, 206 NLRB 779 (1973)).

2. No disparate treatment.

While the newest ULP charge again tries to claim coercive conduct by Apple Bus based on a 2018 discharge and 2019 disparate treatment, doing so is improper here where the ULP's false allegations remove any possible taint on the petition. *See Tenneco Auto, Inc. v. NLRB*, 716 F.3d 640, 650 (D.C. Cir. 2013) (noting violations that cause dissatisfaction with a union, among others, is that "those involving coercive conduct such as discharge"). Teamsters would have it believed that Apple Bus gave favorable treatment to Chase, Reichert, and Fisher in response to accidents only because they are non-union members based on its recitation of the facts. And that Apple Bus

gave Knight, Johnson, and Concepcion harsher treatment for similar accidents based solely on their union membership status. Yet Teamsters recitation of the facts is wrong.

First, Apple Bus discharged Knight for leaving children alone on her unsecured school bus while it was running, which is against training and company policies and is a dischargeable infraction that neither Chase, Reichert, nor Fisher have ever committed nor been warned or accused of committing. *See* Ex. E, at Ex. N, Chase Decl., ¶ 11; Ex C, Reichert Decl., ¶ 10; Ex D, Fisher Decl., ¶ 7. In addition, there is no evidence that Apple Bus knew Knight was an avid union supporter and that this formed the basis of her March 28, 2018 discharge. Nor could Chase and her fellow employees have known about Knight's March 28, 2018 firing when they filed their second decertification case thirteen days prior on March 15, 2018. Furthermore, Teamsters did not file its initial ULP about Knight until June 12, 2018, almost three months after Apple Bus had fired Knight for leaving children unattended. Ex. E, at Ex. M.

Teamsters attempts to dredge up an old claim by misstating the facts of Reichert's situations is particularly inappropriate. Contrary to Teamsters's claim, Reichert's accident was not similar to Knight's because Reichert properly secured her bus and removed the keys before she briefly left it. Ex C, Reichert Decl., ¶ 5. After Apple Bus investigated the incident, it informed Reichert that no discipline was required because the video recording showed that she properly handled the situation. Ex C, Reichert Decl., ¶ 6. Since no violation occurred, Reichert and Knight's situations are not similar, and no disparate treatment took place.

Second, Johnson received exactly the same response to her accident that Reichert and Fisher did—retraining and a write-up. Yet Teamsters argues that Johnson's same treatment for a similar accident was improper based on an accident that Reichert never committed and its claim that Fisher never had to do retraining. Not only is there no disparate treatment since Reichert and

Fisher both had to do retraining for similar violations, Ex C, Reichert Decl., ¶¶ 7–8; Ex D, Fisher Decl., ¶¶ 5–6, Reichert did not even commit the offense of side swiping another bus that Teamsters is falsely claiming she did. Ex C, Reichert Decl., ¶¶ 7–9. Rather, she failed to engage her parking break and rolled into the parked bus in front of her when no children were on or near either bus. Ex C, Reichert Decl., ¶ 7.

When analyzing the true facts, one is at a loss on how Teamsters can claim disparate treatment in light of Apple Bus's consistent treatment of employees for similar violations—retraining and a write-up in the employee's file or discharge for the gross offense of leaving young children unsecured on a bus. Since Apple Bus did not disparately treat employees based on their respective non-union membership status, there are no facts that could cause disaffection, nor could such incidents have influenced the decertification election filed in March 2018.

3. No serious unilateral changes.

Not only is the claimed discharge and disaffection here insufficient to show a causal nexus, the remaining allegation in the ULP charge does not allege a serious unilateral change by Apple Bus that improperly affects the bargaining relationship or that is an essential employment term and condition. The violation types that cause dissatisfaction with the union usually involves the employer "withholding benefits, and threats to shutdown the company operation." *Tenneco Auto*, 716 F.3d at 650 (finding employer's refusal to provide union addresses of replacement employees, requirement that employees obtain company permission before posting materials, and discipline of union advocate did not taint petition); *see also Goya Foods*, 347 NLRB 1118, 1122 (2006) (finding hallmark violations are those "issues that lead employees to seek union representation").

Teamsters claims Apple Bus issued Concepcion a written warning for attendance issues when the company has no attendance policy at all. Ex. B, at 2. Teamsters then claims that Apple

Bus added insult to injury by doing so against Concepcion after it had suspended him in 2018 for simply hitting a guard rail. Ex. B, at 2. While it stretches credulity to believe that a place of business would have no attendance requirement for an employee to retain his or her job, such a requirement that results in a written write up if violated is not an essential term and condition of employment leading to a taint of the decertification election.

Further, Teamsters's implication that Concepcion's accident of hitting a guard rail with his bus while driving it is like Reichert rolling into the bus in front of her or Fisher hitting the bus behind him, both when no students were on or near the buses, simply is incongruous. Ex C, Reichert Decl., ¶¶ 7–8; Ex D, Fisher Decl., ¶¶ 5–6. Indeed, Teamsters suspiciously omits whether children were present on the bus when Concepcion hit the guard rail, or any other factors establishing similarities between several diverse incidents. Nor is there any evidence that Apple Bus knew Concepcion was a union supporter when he had his accident in 2018 or when it wrote him up in 2019 for his attendance failures, or that his union status is the sole basis for why Apple Bus issued a written warning or suspended him.

4. No encouragement to seek union representation.

None of the claimed Apple Bus conduct is of the type that encourages employees "to seek union representation." *Goya Foods*, 347 NLRB at 1122. Just because one is a non-union member does not mean Apple Bus is giving favorable treatment. Yet that is what Teamsters would have assumed based on its recitation of the facts, a recitation that is inaccurate as set forth above, *supra* Sections I.D.2–3. The claims and sequence of events here remove even the specter of taint from this decertification petition and suggests the ULP charge was, yet again, Teamsters's strategic attempt to block the election. *See Pinnacle Foods Grp., LLC*, 2019 WL 656304, at *1 (Chairmen Ring and Member Kaplan noting the suspect timing of a ULP "filed 18 months after the Union's

certification and 12 months after the parties began bargaining, but only days after the decertification petition was filed" suggests a primary purpose of delaying the decertification election and supports the Board's revisit of "the blocking charge policy in a future rulemaking proceeding").

5. Ultimately fails the Master Slack *test.*

Even if Teamsters' newest charge had merit, which it does not, it cannot block the election and nullify employees' Sections 7 and 9 rights because there is no "possibility of their detrimental or lasting effect on employees," no "possible tendency to cause employee disaffection from the union," and no negative affect on "employee morale" *Master Slack*, 271 NLRB at 84; *see also Tenneco*, 716 F.3d at 650. As has been noted multiple times, Petitioner and the other bargaining unit members already had determined they were dissatisfied with Teamsters and had filed their second decertification fifteen months before this new ULP charge was filed. All of this occurred long before Teamsters's new charge, and almost six months after the alleged violations occurred before Teamsters even filed the applicable charge. Ex. A.

In turn, even assuming Chase, Reichert, and Fisher committed the alleged misconduct without the "appropriate" discipline and even assuming the violations claimed here would have a "detrimental or lasting effect on employees," cause "employee disaffection from the union," and negatively affect "employee morale," *id*., Apple Bus would have had to terminate Knight, written up Johnson, and suspended and disciplined Concepcion all while letting Chase, Reichert, and Fisher "off the hook" *before* the bargaining unit majority decided they wanted the union out. Yet Petitioner and the bargaining unit members already had determined they were dissatisfied with Teamsters and had filed the second decertification on March 15, 2018—almost a full year before the alleged disparate treatment occurred here and fifteen months before this newest charge was

filed. The sequence of claimed events here removes any possible taint from the decertification petition and suggests the ULP simply was another strategic attempt to block the election rather than to vindicate legal rights.

There is no causal connection, as required by *Master Slack,* between this ULP charge and Petitioner's decertification petition. Here, employees have been disenchanted with Teamsters for several years. Any way Teamsters's charge is evaluated, it lacks merit. Even if it did not, it cannot block the election and nullify employees' Sections 7 and 9 rights.

II. Alternatively, the Board should require the Region to process the petition or establish a "causal nexus" between the alleged Employer infractions and the employees' decertification desire to justify the "blocking charge" policy's continued application.

A. [Incorporated from Fourth Request for Review. *See* Ex. E, at 19.]

B. The Region should establish, either itself or by requiring Teamsters to do so at a *Saint-Gobain* hearing, that a "causal nexus" exists precluding application of Exception 2 and the election's processing.

The Regional Director should, before blocking the election, have to establish why he 1) opines that there is a causal nexus between the charges and the decertification petition that precludes the election's processing, Casehandling Manual Sec. 11730.4 (noting if a Regional Director establishes no causal relationship between the ULP allegations and a decertification petition, the Regional Director should reconsider whether the charge should continue to block the petition's processing), and 2) believes the employees could not exercise their free choice in an election despite "blocking charges" and thereby excluding application of Exception 2, Casehandling Manual Sec. 11731.2 (noting a decertification election should proceed and the Regional Director should deny a blocking request where individuals could exercise their free choice). A mere statement that the "Union filed a request to block together with an offer of proof detailing its evidence in support of the allegations"—which offer of proof appears to be Teamsters

inaccurate recitation of the facts—and that based on this the Regional Director has "determined the decertification petition will be held in abeyance pending the investigation" is insufficient without more to establish either requirement. Ex. A, at 1.

In the alternative, the Regional Director should require Teamsters to prove a "causal nexus" exists at a *Saint-Gobain* evidentiary hearing. For a ULP to taint a petition or block an election, there must be a "causal nexus" between Apple Bus's actions and the employees' dissatisfaction with Teamsters. *Master Slack*, 271 NLRB 78. But here, there has been no such showing nor did the Regional Director compel Teamsters to make such a showing. Not only did the alleged violations occur almost a year after the decertification had been filed negating any causal connection, Petitioner is left to speculate about Teamsters's claimed causal connection between the employees' motivations for wanting to oust Teamsters and Teamsters's newest allegations.

At the very least, the Board should require the Regional Director to hold a *Saint-Gobain* hearing as a precondition to blocking an election based on Teamsters's ULP charges. *Saint-Gobain Abrasives, Inc.*, 342 NLRB at 434. At such an adversarial hearing Teamsters will have to meet its burden of proof that a "causal nexus" exists. *See, e.g.*, *Roosevelt Mem'l Park, Inc.*, 187 NLRB 517, 517–18 (1970) (holding a party asserting a bar's existence bears the burden of proof). As the Board noted in *Saint-Gobain*, "it is not appropriate to speculate, without facts established in a hearing, that there was a causal relationship between the conduct and the disaffection. To so speculate is to deny employees their fundamental Section 7 rights." *Saint-Gobain Abrasives, Inc.*, 342 NLRB at 434. But with no *Saint-Gobain* hearing or an explanation from the Region, all this record contains is conjecture by Teamsters, the very party desiring to delay its own decertification.

The Regional Director has erred, again and again, by reflexively blocking this election and by failing to find, or by failing to require Teamsters to prove in an adversarial hearing, the "causal

nexus" between the allegations in Teamsters's ULP charges and the employees' continued disaffection. Petitioner and her fellow employees' Section 7 and 9 rights have been rendered meaningless by this process for almost two years.

CONCLUSION

The Board should grant Petitioner's Request for Review, reverse the Regional Director's decision, and order the Regional Director to process this decertification petition and count the ballots. In addition, the Board should overrule or substantially overhaul its "blocking charge" policy.

Respectfully submitted,

/s/ Amanda K. Freeman
Amanda K. Freeman
Glenn M. Taubman
c/o National Right to Work Legal
Defense Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, VA 22160
Telephone: (703) 321-8510
Fax: (703) 321-9319
akf@nrtw.org
gmt@nrtw.org

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2019, a true and correct copy of the foregoing Request for Review was filed with the Executive Secretary using the NLRB e-filing system, and copies were sent to the following parties via e-mail, as noted:

W. Terrence Kilroy
Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, MO 64112
tkilroy@polsinelli.com

John Eberhart, Esq.
Teamsters Local 959
520 E. 24th Avenue, Suite 102
Anchorage, Alaska 99503
jeberhart@akteamsters.com

Region 19
915 2nd Ave, Suite 2948
Seattle, WA 98174-1006
Ronald.Hooks@nlrb.gov
Rachel.Cherem@nlrb.gov

/s/ Amanda K. Freeman
Amanda K. Freeman